

JODI LINKER
Federal Public Defender
Northern District of California
SAMANTHA JAFFE
Assistant Federal Public Defender
13th Floor Federal Building - Suite 1350N
1301 Clay Street
Oakland, CA 94612
Telephone: (510) 637-3500
Facsimile: (510) 637-3507
Email: Samantha_Jaffe@fd.org

Counsel for Defendant MORGAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL MORGAN,

Defendant.

Case No.: 4:23-mj-71424 MAG

**STIPULATION AND ORDER TO
CONTINUE STATUS HEARING TO
FEBRUARY 20, 2024 AND TO
EXCLUDE TIME**

Hearing Date: January 12, 2024

Hearing Time: 10:30 a.m.

The above-captioned matter is set on January 12, 2024, at 10:30 a.m. for a status regarding preliminary hearing and arraignment. The parties jointly request that the Court continue this matter to February 20, 2024 and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) until February 20, 2024.

Mr. Morgan is charged with mail theft and theft of mail keys. The government has produced discovery, which includes 22 video files along with reports and photographs. Mr. Morgan is vision-impaired and resides out of District, and so reviewing discovery with him requires additional time, particularly because he cannot see either documents or videos himself.

Counsel for the defense and government counsel are also continuing to negotiate to resolve this case. Additional time will allow for those continued negotiations, as well as continued review of the

1 discovery and discussions about it with Mr. Morgan.

2 The parties stipulate and agree that the ends of justice served by this continuance outweigh the
3 best interest of the public and the defendant in a speedy trial. The parties agree also that the failure to
4 grant this continuance would deny counsel for Mr. Morgan the reasonable time necessary for
5 effective preparation, taking into account the exercise of due diligence. Accordingly, the parties agree
6 that the period of time between January 12, 2024, through February 20, 2024, should be excluded in
7 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for
8 effective preparation of defense counsel, taking into account the exercise of due diligence.

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11 Dated: January 5, 2024

Respectfully submitted,

12 JODI LINKER
13 Federal Public Defender
Northern District of California

14 /S/

15 SAMANTHA JAFFE
16 Assistant Federal Public Defender

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18 Dated: January 5, 2024

19 ISMAIL J. RAMSEY
20 United States Attorney
Northern District of California

21 /S/

22 EVAN MATEER
23 Assistant United States Attorney
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

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MICHAEL MORGAN,

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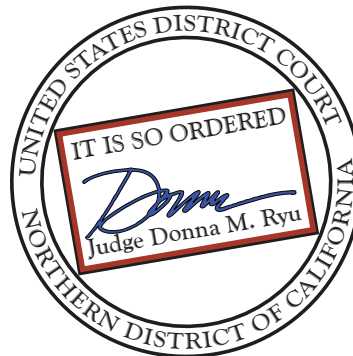
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**ORDER TO CONTINUE STATUS
HEARING**

Based on the agreement of the parties in the stipulation above, the status hearing regarding preliminary hearing and arraignment presently set for January 12, 2024, at 10:30 a.m., is vacated. This matter is reset to February 20, 2024, at 10:30 a.m.

IT IS SO ORDERED.

Dated: January 9, 2024



HON. DONNA M. RYU
Chief United States Magistrate Judge